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September 17, 1992

RECEIVED

Ms. Donna R. Searcy Secretary Federal Communications Commission 1919 M Street, N.W. Washington, D.C. 20554

'SEP 1 7 1992

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

Petition for Reconsideration of Re: Report and Order DA92-1128 Paradise and Fort Bragg, CA

Dear Ms. Searcy:

MICHAEL H. BADER

WILLIAM J. BYRNES

JAMES E. DUNSTAN

JOHN WELLS KING

DAVID G. O'NEIL JOHN M. PELKEY

KENNETH A. COX

MARY PRICE TAYLOR

COUNSEL

THEODORE D. KRAMER

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BENJAMIN J. LAMBIOTTE

JOHN CRIGLER

On September 11, 1992, Henry Radio Co. filed the abovereferenced Petition for Reconsideration. Through inadvertence the Engineering Report that was to be attached was inadvertently omitted. Please find enclosed the original and three copies of the Engineering Report. Kindly associate it with the Petition for Reconsideration. Thank you for your assistance in this regard.

Should you have any further questions concerning this matter please contact this office directly.

RMR/das

Enclosure

(w/encl) cc:

Mr. Robert Cheal

Ms. Nancy Joyner (FCC) Mr. Michael Ruger (FCC)

# **RECEIVED**

ISEP 1 7 1992 ---

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

ORIGINAL FILE

THE HENRY RADIO COMPANY

RADIO STATION KLLK-FM CHANNEL 228B, 93.5 MHz FORT BRAGG, CALIFORNIA

ENGINEERING EXHIBIT IN SUPPORT OF PETITION FOR RECONSIDERATION FOR KLLK-FM IN MM DOCKET NO. 92-86 (RM-7961)

August 18, 1992

Brian J. Henry Consulting Engineer Willits, California

> No. of Copies rec'd\_ List A B C D E

RADIO STATION KLLK-FM CHANNEL 228B, 93.5 MHz FORT BRAGG, CALIFORNIA

## STATEMENT OF BRIAN J. HENRY, CONSULTING ENGINEER

I have been retained by the Licensee of KLLK-FM at Fort Bragg, California (FCC License File No. BMLH-910318KC) to prepare the engineering portion of this Engineering Exhibit of this Petition For Reconsideration.

## ALLOCATION CONSIDERATIONS

The purpose of this Engineering Exhibit is to provide information to support a change in the reference point coordinates for KLLK-FM within the context of The Commission's rulemaking proceeding of upgrading KZZP(FM) from its present Class "A" status to that of a Class "Bl" facility. It was requested by Paradise Broadcasting Incorporated (Paradise) in MM Docket No. 92-86 (RM-7961) that KLLK-FM be moved from channel 244B to 228B to facilitate its upgrade to that of a Class Bl facility.

In this Petition for Reconsideration. The Henry Radio Company is requesting to have the reference point for KLLK-FM moved inland from the Pacific coastline to afford it an improved transmitter location that the allocation of channel 228B in the Paradise rulemaking provides for. The existing transmitter site at Bald Hill (N39-27-53. W123-45-27) is approximately five kilometers from the Pacific Ocean, and renders a significant portion of the station's wide area Class B coverage as unuseable to the local population.

The proposed reference point change for KLLK-FM can be made in compliance with the required mileage separation and city grade signal coverage stipulations using the geographic coordinates of North Latitude 39-21-46 and West Longitude 123-28-31. A transmitter located at this location will provide the required city grade coverage to the entire city of Fort Bragg, California.

A frequency search was performed for Fort Bragg. California on channel 228B using these coordinates. The results show that this proposal meets all the mileage separation criteria as required by the Rules and Regulations.

## DISTANCE TO 70 DBU CONTOUR

The proposed transmitter location (N39-21-46, W123-28-31) is located 30.5 km east of Fort Bragg, California. Assuming maximum Class B facilities, the proposed 70 dBu contour will encompass Fort Bragg, California.

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#### CONCLUSIONS

- 1. The proposed new reference point will allow KLLK-FM to significantly improve its service to the residents of Fort Bragg, California by placing more of it's authorized signal over land rather than out over the Pacific Ocean.
- 2. All mileage separation and spacing requirements required by the Rules and Regulations are satisfied.

# LIST OF FIGURES

In Carrying out the engineering studies, the following attached figures were prepared by me or under my direct supervision.

- 1. FM Channel Study for Fort Bragg, California on Channel 228B.
- 2. Geographic Map showing that KLLK-FM's class contour of 32 km completely encompasses the community of Fort Bragg, California from the proposed new reference point.

BRIAN J. HENRY Consulting Engineer

August 18, 1992

## <u>AFFIDAVIT</u>

State of California	a )
	) ss:
County of Mendocine	o )

Brian J. Henry, being duly sworn upon oath, deposes and says:

- 1. That he is qualified engineer employed as Brian J. Henry, Consulting Engineer.
- 2. That he graduated with honors from Napa College with an Associated of Arts Degree in Natural Science in 1982, and a Bachelor of Arts Degree in Mass Communications from the University of California at Berkeley in 1984.
- 3. That the firm of Brian J. Henry . Consulting Engineer, has been retained by The Henry Radio Company for the purpose of preparing this engineering exhibit for this Petition for Reconsideration.
- 4. That he has carried out such engineering work and that the results are attached hereto and form a part of this affidavit, and
- 5. That the foregoing statement and the report regarding the aforementioned engineering work are true and correct of his own knowledge except such statements therein made on information and belief, and as such statements, he believes then to be true.

Brian J. Henry

Subscribed and sworn to before me this 18th day of August, 1992.

OFFICIAL SEAL

CHERYL A. CURREY
NOTARY PUBLIC - CALIFORNIA
COUNTY OF MENDOCINO

My Commission Expires Sept. 22, 1995

# Broadcast Data Services

Date 8/18/92 page 1

Study Name : KLLK-FM Channel : 228B

Coordinates: N 39 21 46.0 W 123 28 31.0 (New Reference Point)

Separations : FM Zones 1 - Commercial

Safety Zone: 50 km

920818

Call City	File Number State	Chan Status	ERP HAAT	Latitude Longitude		Bear Zone	Notes	Required Clearance
KHTT HEALDSBURG	BLH-791211AJ	225B LIC	2.30 595		45.0	140.4	86.40	74.0 12.4
KXGO ARCATA	BLH-850606KJ CA	226C LIC	100 500	40 43 123 58	36.0 19.0	3 <b>44.</b> 6	157.26	105.0 52.3
KYA SAN FRANCI	BLH-880429KB SCO CA	227B LIC	50.0 150		27.0 7.0	146.7 1	216.97	169.0 48.0
KSUEFM SUSANVILLE	BLH-860716KA CA	227C LIC	100 352	40 27 120 34	13.0 14.0	63.0 2	276.34 Comnt	217.0 59.3
D92-86 FORT BRAGG	RM-7961 CA	228B PADD		39 27 123 45	53.0 27.0	295.1 1	26.81	241.0 -214.2
KRXQ ROSEVILLE	BLH-880819KG CA	229Bl LIC	25.0 99	38 43 121 14	12.0 9.0	109.6	206.60	145.0 61.6
KRXQ ROSEVILLE	BPH-920407IB CA	229Bl APP	25.0 100	38 <b>44</b> 121 12	22.0 48.0	108.8	207.68	145.0 62.7
NEW SEBASTOPOL	BPH-880519MX CA	229A APPG	0.53 238	38 20 122 51	43.0 38.0	154.6	124.92 Comnt	113.0 11.9
NEW SEBASTOPOL	BPH-880519MD CA	229A APPD	0.62 222	38 20 122 51	42.0 38.0	15 <b>4.6</b>	124.95 Comnt	113.0 12.0
NEW SEBASTOPOL	BPH-880519NR CA	229A APPD	0.63 207	38 20 122 51	51.0 54.0	154.7 1	124.54 Comnt	113.0 11.5
NEW SEBASTOPOL	BPH-880518MB CA	229A APPD	0.65 208	38 20 122 51	52.0 52.0	154.7 1	124.53 Comnt	113.0 11.5
D80-90 SEBASTOPOL	CA	229A ALC		38 24 122 49		151.9	120.99 Comnt	113.0 8.0
KTMT MEDFORD	BLH-890803KC OR	229C LIC		42 4 122 43		11.7	308.65	217.0 91.6
KFMF CHICO	BLH-880811LB CA	230Bl LIC		39 56 121 43		66.1 1	163.87	71.0 92.9
			DDT 331	T ******	. 3.5			

BRIAN J. HENRY

CONSULTING ENGINEER

FIGURE 1

# Broadcast Data Services

Date 8/18/92 Page 2

Study Name : KLLK-FM

Channel : 228B

Coordinates: N 39 21 46.0 W 123 28 31.0 (New Reference Point)

Separations : FM Zone 1 - Commercial

Safety Zone: 50 km

Call City	File Number State	Chan Status	ERP HAAT	— <b>,</b>		Zone	Dist(km) Notes	Clearance	
KPFA BERKELEY	BLH-4054 CA	231B LIC	59.0 405		51	55.0	1 <b>46.4</b>	198.96	74.0 125.0
NEW WINDSOR	BPH-911115ME CA	281A APPM	0.28 338	38 3 122 5		25.0 41.0	153.9	101.60 Comnt	15.0 86.6
NEW WINDSOR	BPH-911115MJ CA	281A APP	0.26 344	38 3 122 5	_	24.0 39.0	153.9	101.64 Comnt	15.0 86.6
NEW WINDSOR	BPH-911115MT CA	281A APP	0.25 337	38 3 122 5		24.0 39.0	153.9	101.64 Comnt	15.0 86.6
NEW WINDSOR	BPH-911115MR CA	281A APP	0.24 346	38 3 122 5		25.0 40.0	153.9	101.61 Comnt	15.0 86.6
WINDSOR	CA	281A ALC	·	38 3 122 5		37.0 12.0	148.5	97.87 Comnt	15.0 82.9
WINDSOR	CA	281A ADD		38 3 122 5		37.0 12.0	148.5	97.87	15.0 82.9
KSHA REDDING	BLH-840405BY CA	282C LIC	100 475	40 3 122 3		14.0 12.0	29.2	164.94	35.0 129.9
KSHA REDDING	BPH-920622IB CA	282C APP	100 475	40 3 122 3		14.0 12.0	29.2 2	164.94	35.0 129.9

